

## **NRR-PMDAPEm Resource**

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**From:** Orenak, Michael  
**Sent:** Tuesday, December 15, 2015 1:48 PM  
**To:** RMJOYCE@southernco.com  
**Subject:** Request for Additional Information for HNP-ISI-ALT-5-01  
**Attachments:** RAIs for HNP-ISI-ALT-5-01.docx

Mr. Joyce,

By letter dated July 16, 2015 (Agencywide Documents Access and Management System Accession No. ML15197A174), Southern Nuclear Operating Company requested relief to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPV Code) at the Edwin I. Hatch Nuclear Plant, Units 1 and 2. Request for Alternative ISI-ALT-5-01 pertains to maintaining inservice inspection and containment inservice inspection related activities on the 2001 Edition through 2003 Addenda of the ASME BPV Code, Section XI.

The U.S. Nuclear Regulatory Commission (NRC) staff has found that further information is needed to complete its review. The draft information request is included in the attached document. The timely responses to this request for additional information helps ensure sufficient time is available to complete the NRC staff's review.

Please provide your response by January 15, 2016.

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**Hearing Identifier:** NRR\_PMDA  
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**Mail Envelope Properties** (Michael.Orenak@nrc.gov20151215134700)

**Subject:** Request for Additional Information for HNP-ISI-ALT-5-01  
**Sent Date:** 12/15/2015 1:47:53 PM  
**Received Date:** 12/15/2015 1:47:00 PM  
**From:** Orenak, Michael

**Created By:** Michael.Orenak@nrc.gov

**Recipients:**  
"RMJOYCE@southernco.com" <RMJOYCE@southernco.com>  
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**Options**  
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**Return Notification:** No  
**Reply Requested:** No  
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**Expiration Date:**  
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REQUEST FOR ADDITIONAL INFORMATION  
FOR REQUEST FOR ALTERNATIVE HNP-ISI-ALT-5-01  
SOUTHERN NUCLEAR OPERATING COMPANY  
EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-321 AND 50-366

By letter dated July 16, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15197A174), Southern Nuclear Operating Company (the licensee) requested relief to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV Code) at the Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2. Request for Alternative ISI-ALT-5-01 pertains to maintaining inservice inspection (ISI) and containment inservice inspection (CII) related activities on the 2001 Edition through 2003 Addenda of the ASME B&PV Code, Section XI.

To complete its review, the U.S. Nuclear Regulatory Commission (NRC) staff requests the following additional information.

1. The licensee states that prior to the end of the period from December 31, 2015, to November 30, 2017, they will request approval from the NRC to update their Section XI activities to the latest ASME B&PV Code edition incorporated by reference in Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a, "Codes and standards," for the entire fleet. Discuss which portions of the ASME B&PV Code, Section XI, that will be updated. Will only the sections that have currently been requested to be retained at the 2001E/2003A be updated to the latest edition, or will all sections be updated to the latest ASME B&PV Code edition incorporated by reference in 10 CFR 50.55a twelve months prior to November 30, 2017?
2. The licensee has requested to extend their current 10-year interval from December 31, 2015, to November 30, 2017. This request could be interpreted as a request to extend the current 10-year ISI interval from December 31, 2015, to November 30, 2017. Please clarify.
3. Identify and provide the approximate date of the refueling outages in which the ISI activities will be based on the ASME B&PV Code 2001 Edition through 2003 Addenda in lieu of the 2007 Edition through 2008 Addenda.
4. In Footnote 5 of the attachment to the relief request, the licensee stated,  
  
*"planar surface flaws in UNS N06600, N06682 or W86182 materials or austenitic stainless steels."*

Enclosure

- a. Please clarify whether there is a typographical error in quoting UNS N06682 and whether the correct material type is UNS N06082; or
  - b. Provide a description of UNS N06682 material and state where it is used at HNP Units 1 and 2.
5. Discuss, and provide justification for, which edition and addenda of the ASME B&PV Code, Section XI, will be used for the non-mandatory appendices during the time period of December 31, 2015, through November 30, 2017.
  6. On page E-3 of HNP-ISI-ALT-5-01, the licensee requests that certain previously approved requests for relief and alternatives be extended. One of the requested extensions states,

Request ISI-ALT-08-02 (Units 1 and 2), authorized on June 24, 2009 and is associated with the R/R program for preemptive overlays, [ADAMS Accession No. ML090340017]. Based on HNP comments, a revised SER was issued on May 26, 2011 [ADAMS Accession No. ML 11139A438].

Regarding ISI-ALT-08-02:

- a. On page 15 of Relief Request ISI-ALT-08-02 (Section 2.1, "Procedure qualifications," paragraph (g), the licensee stated that,

The average lateral expansion value of the [heat affected zone] HAZ Charpy V-notch specimens shall be equal to or greater than the average lateral expansion value of the three unaffected base metal specimens. However, if the average lateral expansion value of the HAZ Charpy V-notch specimens is less than the average value of the unaffected base metal specimens and the procedure qualification meets all the other requirements of the Appendix 1 of the submittal, either of the following shall be performed:

- a. The welding procedure shall be requalified.
- b. An Adjustment Temperature for the procedure qualification shall be determined in accordance with the applicable provisions of NB-4335.2 of Section III, 2001 Edition with 2002 Addenda. The  $RT_{NDT}$  or lowest service temperature of the materials for which the welding procedure will be used shall be increased by a temperature equivalent to that of the Adjusted Temperature.

Based on the above information, the NRC staff requests that the licensee:

- i. Identify whether aforementioned option (a) or option (b) was used in the temperbead weld qualification for HNP, Units 1 and 2, weld overlays that were performed under Relief Request ISI-ALT-08-02.

- ii. If the welding procedure specification (WPS) was qualified with option (b), provide the value for the new Adjusted Temperature for the vessel component (where temperbead structural overlay was applied). Identify if this Adjusted Temperature value was considered in the evaluation of the vessel integrity analyses (e.g., pressure-temperature curves-if applicable).

7. Note 6 on page A-2 of HNP-ISI-ALT-5-01 states,

As required by 10 CFR 50.55a(b)(3)(v), snubber pre-service and inservice inspection and testing requirements are implemented in Subsection ISTD of the ASME [Code for Operations and Maintenance of Nuclear Power Plants] OM Code, 2004 Edition through 2006 Addenda in its entirety.

SNC submitted snubber program on October 31, 2014 (ADAMS Accession No. ML14349A471) for fourth 10-year interval that was based on the ASME OM Code, 2001 Edition through 2003 Addenda. Please explain the discrepancy between the ASME OM Code Editions.

8. Note 2 on page A-2 of HNP-ISI-ALT-5-01 states,

HNP is proposing to use IWA-2100, 2200, 2300 and 2600 from the 2001 Edition/2003 Addenda for requirements applicable to authorized inspection, examination methods, qualification of NDE personnel and the weld reference system. However, HNP will use the 2007 Edition/2008 Addenda when using IWA-2400 and 2500 for the selection, planning and scheduling of ISI/CII examinations and tests.

Provide the reason why two separate editions/addenda of the ASME B&PV Code will be used for the same IWA-2000 section.

9. The table on page A-1 of HNP-ISI-ALT-5-01 shows that IWB, IWC, IWD, IWE, and IWF-1000 and -2000 of the 2007 edition and 2008 addenda will be used in the fifth ISI interval. Discuss why IWA-1000 of the 2007 edition and 2008 addenda will not be used in the fifth ISI interval.